

**EXHIBIT 6**

**Donald Doyle Deposition Excerpts**

- Pages 12-13, 18, 21 from the deposition testimony of Donald Doyle, taken April 4, 2011.

<p style="text-align: right;">Page 10</p> <p>1 A. Yes.</p> <p>2 Q. All right. Sometimes counsel may have</p> <p>3 objections. So same rules apply. They have to put on</p> <p>4 that on the record for future discussion with the</p> <p>5 judge. You can still answer the question but give</p> <p>6 them a second to get that on the record so we're not</p> <p>7 all stepping on each other's words? Okay?</p> <p>8 A. Yes.</p> <p>9 Q. Sometimes I'm fuzzy. I may not ask a question</p> <p>10 clearly. Tell me if you have a problem understanding</p> <p>11 what I am getting at, and I'll try to rephrase. Okay?</p> <p>12 A. Yes.</p> <p>13 Q. Sometimes we'll be talking about things that</p> <p>14 happened a while ago. And so we might talk about a</p> <p>15 date or a volume and you might not remember a specific</p> <p>16 date or specific amount, but you can probably ball</p> <p>17 park.</p> <p>18 For example, a year or a decade that kind of</p> <p>19 thing. So to the extent you remember something give</p> <p>20 us your best recollection, but understand no body</p> <p>21 wants you to guess. Okay?</p> <p>22 A. Correct.</p> <p>23 Q. At the end of the process you do get a written</p> <p>24 copy that you can revisit our lovely time together and</p> <p>25 enjoy the memories. At that point in time you will be</p>	<p style="text-align: right;">Page 12</p> <p>1 what you received.</p> <p>2 (Exhibit 1 marked and attached.)</p> <p>3 A. Yes. This is the same.</p> <p>4 Q. Okay. And attached to that -- let' see, was</p> <p>5 there a request for documents? I can't remember if</p> <p>6 there was or not.</p> <p>7 A. Yes.</p> <p>8 Q. Did you have any documents in your possession?</p> <p>9 A. No, I do not.</p> <p>10 Q. All right. Just generally, can you tell us how</p> <p>11 far did you go in school?</p> <p>12 A. Associate degree.</p> <p>13 Q. What was your area of emphasis?</p> <p>14 A. Business.</p> <p>15 Q. Any courses in chemistry?</p> <p>16 A. High school.</p> <p>17 Q. And what about any additional training in</p> <p>18 hydrogeology?</p> <p>19 A. No.</p> <p>20 Q. Toxicology?</p> <p>21 A. No.</p> <p>22 Q. Okay. Any professional licences?</p> <p>23 A. Real estate.</p> <p>24 Q. Okay. And then let's talk about this station,</p> <p>25 the Arco station we began talking about. 4594 East</p>
<p style="text-align: right;">Page 11</p> <p>1 able to make changes to your testimony if you remember</p> <p>2 something, if something is incorrectly transcribed</p> <p>3 then you can make those types of changes.</p> <p>4 I do caution every witness that depending on the</p> <p>5 kinds of changes you make, I or other counsel can</p> <p>6 comment on your credibility.</p> <p>7 For example, if all of your no answers become</p> <p>8 yes answers, somebody might point out that that was a</p> <p>9 little fishy.</p> <p>10 A. Yes.</p> <p>11 Q. Because I have to ask, are you under the</p> <p>12 influence of any drugs or alcohol or medication that</p> <p>13 would impair your memory or ability to testify?</p> <p>14 A. No.</p> <p>15 Q. Excellent. We do take breaks, tell me if you</p> <p>16 need to stretch your legs or get up, and we can go off</p> <p>17 the record. Okay?</p> <p>18 A. Yes.</p> <p>19 Q. Any questions about the process?</p> <p>20 A. No.</p> <p>21 Q. The first exhibit I have, I think is a copy of</p> <p>22 what you received and you can tell me if that's true.</p> <p>23 The notice is on top, but I think what is</p> <p>24 attached here is the subpoena.</p> <p>25 If you Can check to see if that is the same of</p>	<p style="text-align: right;">Page 13</p> <p>1 Tulare, what was your relationship to that station?</p> <p>2 A. We purchased it, my wife and I, from Martin</p> <p>3 Oil Company. It was probably purchased under the</p> <p>4 name -- either been my wife and myself or El Monte</p> <p>5 Gas Co., Inc.</p> <p>6 Q. Do you remember the year?</p> <p>7 A. No.</p> <p>8 Q. Okay. Do you know who supplied the gas to that</p> <p>9 station?</p> <p>10 MS. KLEAVER: Calls for speculation.</p> <p>11 BY MS. AUSTIN</p> <p>12 Q. That's an example of an objection she's putting</p> <p>13 on the record. But you can still answer if you</p> <p>14 understand it. I know it's a little awkward.</p> <p>15 A. You know, it is. I know we wanted to brand</p> <p>16 Exxon because that was our brand of choice at the</p> <p>17 time. I don't know whether we did that or not. I</p> <p>18 don't remember that.</p> <p>19 Q. Did you work at the station?</p> <p>20 A. No.</p> <p>21 Q. Did you lease it out to someone else?</p> <p>22 A. Yes. We leased it out to Narinder Singh</p> <p>23 Dillon.</p> <p>24 THE REPORTER: What was that?</p> <p>25 THE WITNESS: Narinder Singh Dillon.</p>

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<p style="text-align: right;">Page 18</p> <p>1 A. They owned the business.</p> <p>2 Q. Okay. And then did they lease it out to</p> <p>3 someone else?</p> <p>4 A. I think they probably had -- may have became a</p> <p>5 partner his name is Paul. I don't remember his last</p> <p>6 name, but Paul I think was operating the station.</p> <p>7 Q. Do you know if that was Paul Wonder Singh?</p> <p>8 A. Probably.</p> <p>9 Q. Do you know if he was related?</p> <p>10 A. You know, I don't think so. But I could be</p> <p>11 wrong. He may be a relative.</p> <p>12 Q. All right. Down below under the comments it</p> <p>13 states that the UGTs, and I'm meaning that to mean the</p> <p>14 underground tanks sold to El Monte Gas. And that was</p> <p>15 you, right?</p> <p>16 A. That's correct.</p> <p>17 Q. And the date on this one was May 30th of '95.</p> <p>18 Does that sound the like the right date when your</p> <p>19 purchased the station?</p> <p>20 A. I don't remember. I really don't know.</p> <p>21 Q. Okay. Is it --</p> <p>22 A. But by this. It's probably is true.</p> <p>23 Q. I don't want to put words in your mouth. I'm</p> <p>24 hoping it refreshes your recollection about the</p> <p>25 timing.</p>	<p style="text-align: right;">Page 20</p> <p>1 the tanks?</p> <p>2 A. It would have been -- well, it would have been</p> <p>3 Narinder reporting to me, then I would be responding</p> <p>4 to what they told me.</p> <p>5 Q. Say you were in the loop?</p> <p>6 A. I was in the loop, yes.</p> <p>7 Q. Looking at the descriptions of the tanks on the</p> <p>8 following pages. It appears that there were four</p> <p>9 ten-thousand gallon tanks.</p> <p>10 Does that sound right to you?</p> <p>11 A. Looks correct.</p> <p>12 Q. Okay. And do you know -- you don't know the</p> <p>13 date when these were installed; is that correct?</p> <p>14 A. No, I don't.</p> <p>15 Q. Okay. The next document I have is Exhibit 7.</p> <p>16 It is a permit to operate and this is again, for the</p> <p>17 same address, and it's listing the owner as El Monte</p> <p>18 again.</p> <p>19 Do you recall receiving permits to operate that</p> <p>20 looks like this document?</p> <p>21 (Exhibit 7 was attached and marked.)</p> <p>22 A. You know, I don't remember this document.</p> <p>23 But, yes, I'm sure we got this. I'm sure -- that</p> <p>24 looks correct.</p> <p>25 Q. The issue date on this is 1996, and the</p>
<p style="text-align: right;">Page 19</p> <p>1 The next Exhibit I have is number 6. And this</p> <p>2 is an underground storage tank permit application</p> <p>3 again, different names though. This one identifies El</p> <p>4 Monte Gas as the tank owner.</p> <p>5 Is this familiar to you?</p> <p>6 (Exhibit 6 was marked and attached.)</p> <p>7 A. Yes.</p> <p>8 Q. Okay. The signature at the bottom, do you</p> <p>9 recognize that one?</p> <p>10 A. That's mine.</p> <p>11 Q. Okay. Did you have any responsibility -- I see</p> <p>12 that you signed this particular permit application.</p> <p>13 Did you have additional responsibilities for</p> <p>14 communicating with the county regarding anything</p> <p>15 pertaining to the station?</p> <p>16 A. At this time I had to of in order -- whatever</p> <p>17 this is for, yes.</p> <p>18 Q. Okay.</p> <p>19 A. Permits for the tanks, yes.</p> <p>20 Q. Did you have any involvement in communicating</p> <p>21 with the county concerning, for example, upgrades to</p> <p>22 the underground storage tanks?</p> <p>23 A. If at this time they needed to be done, yes.</p> <p>24 Q. Okay. And what about inventory? Did you</p> <p>25 communicate with the county regarding the inventory in</p>	<p style="text-align: right;">Page 21</p> <p>1 expiration is 1998.</p> <p>2 A. '98.</p> <p>3 Q. When did you actually operate the station</p> <p>4 until?</p> <p>5 I didn't ask that very well. How long did you</p> <p>6 own the station?</p> <p>7 A. I don't remember. We didn't own it very long.</p> <p>8 We sold it to Narinder.</p> <p>9 Q. Do you know if he still owned it at the</p> <p>10 expiration in 1998?</p> <p>11 A. No, I don't.</p> <p>12 Q. Let's see if this will help us out here.</p> <p>13 Sometimes the documents end up telling the story.</p> <p>14 A. Well, they are so far.</p> <p>15 Q. They are. I appreciate that you recognize a</p> <p>16 few in here.</p> <p>17 So number 8 this is the underground storage</p> <p>18 permit application again, a different form. And this</p> <p>19 time it is listing property owner as Kupral and</p> <p>20 Narinder Singh. Does this help refresh your</p> <p>21 recollection that you resolved these things by May of</p> <p>22 1998?</p> <p>23 (Exhibit 8 was marked and attached.)</p> <p>24 A. That sounds correct. This looks correct.</p> <p>25 Q. Flying right through here. Let's see.</p>

6 (Pages 18 to 21)